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for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

PANAGIOTIS SAKELLARIOU SETTLEMENT,
an irrevocable trust u/a/d 12/17/92, SG HAMBROS
BANK & TRUST (BAHAMAS) LIMITED, in its
capacity as trustee of the Panagiotis Sakellariou
Settlement an irrevocable trust u/a/d 12/17/92,
CONSTANTINE PALEOLOGOS, individually,

Adv. Pro. No. 10-04392 (SMB)

CELIA PALEOLOGOS, individually, Defendants.
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**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through their counsel, Baker & Hostetler LLP, and (i) Panagiotis Sakellariou Settlement, an irrevocable trust u/a/d 12/17/92; and (ii) SG Hambros Bank & Trust (Bahamas) Limited, in its capacity as trustee of the Panagiotis Sakellariou Settlement, an irrevocable trust u/a/d 12/17/92 (“Defendants”), by and through their counsel, Flemming Zulack Williamson Zauderer LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On November 30, 2010, the Trustee filed and served the Complaint against Defendants.
2. On April 17, 2014, Defendants filed and served the Answer to the Complaint on the Trustee.
3. Pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181], the Parties entered into a Settlement Agreement and Release on August 8, 2016.
4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendants in the above-captioned adversary proceeding and dismissal of the adversary proceeding with prejudice.

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

7. The Bankruptcy Court shall retain jurisdiction over this Stipulation.

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Date: August 19, 2016
New York, New York

BAKER & HOSTETLER LLP

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Sakellariou Settlement, an irrevocable trust
u/a/d/ 12/17/92, and SG Hambros Bank &
Trust (Bahamas) Limited, in its capacity as
trustee of the Panagiotis Sakellariou
Settlement, an irrevocable trust u/a/d 12/17/92*

SO ORDERED:

Dated: August 19, 2016
New York, New York

/s/ STUART M. BERNSTEIN
Hon. Stuart M. Bernstein
United States Bankruptcy Judge